

APPENDIX

Appendix A

Citation Check for Dkt. 174 – George’s Response

Pg.	George’s Citation	Actual Content	Notes
3	Exhibit F – Defendant’s Responses to Interrogatories, BHISD Bates No. 000302	BHISD 302 is the second page from Archived Board Meeting Minutes, 1988.	BHISD’s Responses to Interrogatories are not Bates-labeled.
3	Exhibit G – Defendant Response to Request for Production, BHISD Bates No. 000303	BHISD 303 is the third page from Archived Board Meeting Minutes, 1988.	BHISD’s Responses to Requests for Production are not Bates-labeled.
3	Exhibit H – Board Meeting Minutes and Parent Advisory Dress Code Committee Notes, BHISD001539–BHISD001544	This Bates range reflects the first six pages of the 4/26/2021 Minutes of Public Hearing & Regular Meeting (BHISD 1539–1550). BHISD 1539 includes details about the PADC committee presentation given by Mark Wilson and Danny Campbell.	There are no PADC notes within this Bates range.
3	Exhibit I – Training PowerPoints and Discipline Memos, BHISD Bates No. BHISD006155–BHISD012466	This Bates range encompasses 128 documents ranging from 2012–2013 BH Intermediate School Online Handbook – MM Notes (BHISD 6155–6214) to Communications with Parents re: Hair Policy – Emails, Blasts, Handouts (BHISD 12454–12466).	This range includes Dress Code PowerPoint presentations (BHISD 7433–7589) and Disciplinary Flow Charts (BHISD 7410–7421).
3	Exhibit J – Email Communications and Grooming Code Drafts, BHISD Bates No. BHISD001–BHISD06154	This Bates range encompasses 75 different documents, ranging from Archived Board Meeting Minutes, 1963–1981 (BHISD 1–203) to 2018–2019 BH Elementary South Student Handbook (BHISD 6007–6154).	
3-4	(Ex. A, Skinner Dep. 38:10–25, BHISD007235; Ex. B, Kana Dep. 41:3–16, BHISD007316; Ex. D, Poole Dep. 29:1–15, BHISD007468)	-BHISD 7235 is the second page of the 2020 Dress Code Exemption Form (BHISD 7234–7235). It is a blank form. -BHISD 7316 is a page from the 2017–2018 BHISD Student Code of Conduct draft presented to the board for approval in the 8/28/2017 Board Packet on Dress Code Revisions (BHISD 7293–7340). -BHISD 7468 is the first slide of the 2018–2019 Dress Code PowerPoint (BHISD 7468–7479).	The Bates-labeled documents do not reflect what is stated in the response.
4	(Ex. B, BHISD007316–BHISD007394)	This Bates range encompasses two different documents: (1) Board Packet on Dress Code Revisions, 8/28/2017 (BHISD 7293–7340); and (2) Board Packet on	The Bates-labeled documents do not reflect what is stated in the response.

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		Dress Code Revisions, 8/26/2019 (BHISD 7341–7394).	
4	(Ex. D, BHISD007468–BHISD007555)	This Bates range encompasses seven different documents from 2018–2019 Dress Code PowerPoint (BHISD 7468–7479) to 2022–2023 Student Dress Code PowerPoint (BHISD 7540–7561).	The Bates-labeled documents do not reflect what is stated in the response.
4	(Ex. F, BHISD001739–1744)	BHISD 1739–1744 are slides from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	The Bates-labeled documents do not reflect what is stated in the response.
5	(Ex. J, BHISD001–06154)	This Bates range encompasses 75 different documents, ranging from Archived Board Meeting Minutes, 1963–1981 (BHISD 1–203) to 2018–2019 BH Elementary South Student Handbook (BHISD 6007–6154).	George is citing grooming code revisions. BHISD 7236–7409 reflect grooming code revisions.
5	(Ex. K, at 6–11)	This citation is correct insofar as it references the Memorandum Opinion filed on 4/03/2025 (Dkt. 167).	
5	(Ex. F, BHISD Response to Interrogatories, at BHISD001739)	BHISD 1739 is a slide depicting a new addition to BHISD Elementary School South. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	George is citing BHISD's response to Interrogatory No. 2. George states that BHISD acknowledged that “no specific disruption has been documented.” That is not in BHISD's response to Interrogatory No. 2.
6	(see Ex. F, BHISD Response to Interrogatories, at BHISD001744)	BHISD 1744 is a slide depicting high school summer renovations. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	
6	(Ex. F, BHISD001739)	BHISD 1739 is a slide depicting a new addition to BHISD Elementary School South. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	George is citing BHISD's response to Interrogatory No. 2 stating BHISD was unable to cite any documented incidents. Interrogatory No. 2 did not request this information. The

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			referenced Bates-labeled document is not related to BHISD's response to Interrogatory No. 2.
6	(Id.)	BHISD 1739 is a slide depicting a new addition to BHISD Elementary School South. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	George is citing BHISD's response to Interrogatory No. 2 for its mention of community standards and career preparation. That is included in BHISD's response to Interrogatory No. 2. The referenced Bates-labeled document is unrelated to BHISD's response to Interrogatory No. 2.
6	(Ex. I, BHISD007526, BHISD007590–007599)	-BHISD 7526 is a slide prompting a "Table Talk" exercise from the 2022–2023 Dress Code PowerPoint (BHISD 7525–7539). -BHISD 7590–7599 includes most of the PADC Committee Meeting Notes (BHISD 7590–7604).	
7	(Ex. H, BHISD007593–007599)	This Bates range reflects a portion of the PADC Documents, including the PADC Committee Meeting Minutes (BHISD 7590–7604).	George states that the PADC minutes reflect anecdotal commentary, which is true.
7	(Ex. J, BHISD001–06154)	This Bates range encompasses 75 different documents ranging from Archived Board Meeting Minutes, 1963–1981 (BHISD 1–203) to 2018–2019 BH Elementary South Student Handbook (BHISD 6007–6154).	George states BHISD changed its dress code policy in late 2023. This is not reflected in any of the documents contained within this Bates range.
8	(See Ex. J, PADC Meeting Notes at BHISD007593; Ex. I, Teacher Training Packet at BHISD007526)	-BHISD 7593 is the first page of the PADC Committee Meeting Notes form 4/9/2021. -BHISD 7526 is a slide prompting a "Table Talk" exercise from the 2022–2023 Dress Code PowerPoint (BHISD 7525–7539).	

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8	(Dkt. 38, at 9–11)	Dkt. 38 is an AO 435 Transcript Request by Ms. Demmler.	George is citing a Memorandum and Order that we are unable to locate.
9	(Ex. C, BHISD Student Code of Conduct at BHISD_000231–32)	BHISD 231–232 are Archived Board Meeting Minutes from a 9/27/1982 special session (BHISD 231) and from a 10/19/1982 regular session (BHISD 232).	The cited documents do not mention dress code policies.
10	(Ex. I, BHISD007526, BHISD007590–007599)	-BHISD 7526 is a slide prompting a “Table Talk” exercise from the 2022–2023 Dress Code PowerPoint (BHISD 7525–7539). -BHISD 7590–7599 includes most of the PADC Committee Meeting Notes (BHISD 7590–7604).	
10	(Ex. D, Poole Dep. 67:1–19, BHISD007468; Ex. E, Malone Dep. 72:11–19, BHISD007556)	--BHISD 7468 is the first slide of the 2018–2019 Dress Code PowerPoint (BHISD 7468-7479). -BHISD 7556 is a slide from 2022–2023 Dress Code PowerPoint detailing common questions on frays and unfinished hems on pants and shorts.	Neither of the cited Bates-labeled documents make any mention of a hair policy or grooming code.
11	See Ex. F, BHISD001739; Ex. G, BHISD000303 (reflecting no evidence of grooming code enforcement against girls)	-BHISD 1739 is a slide depicting a new addition to BHISD Elementary School South. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond. -BHISD 303 is the third page from Archived Board Meeting Minutes, 1988.	Neither of the cited documents makes any mention of a hair policy or grooming code.
12	(Ex. B, Kana Dep. 48:1–12, BHISD007316)	BHISD 7316 is a page from the 2017–2018 BHISD Student Code of Conduct draft presented to the board for approval in the 8/28/2017 Board Packet on Dress Code Revisions (BHISD 7293–7340).	This Bates-numbered document does not reflect what is stated in the response.
12	(Ex. D, Poole Dep. 34:2–9, BHISD007468)	BHISD 7468 is the first slide of the 2018–2019 Dress Code PowerPoint (BHISD 7468–7479).	This Bates-numbered document does not reflect what is stated in the response.
12	(Ex. E, Malone Dep. 56:18–23; 72:11–19, BHISD007556)	BHISD 7556 is a slide from 2022–2023 Dress Code PowerPoint detailing common questions on frays and unfinished hems on pants and shorts.	This Bates-labeled document does not reflect what is stated in the response.
13	(Ex. E, Malone Dep. 56:18–23; 72:11–19, BHISD007556;	-BHISD 7556 is a slide from 2022–2023 Dress Code PowerPoint detailing common	These Bates-labeled documents do not

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	Ex. D, Poole Dep. 34:2–9, BHISD007468; Ex. B, Kana Dep. 48:1–12, BHISD007316)	questions on frays and unfinished hems on pants and shorts. -BHISD 7468 is the first slide of the 2018–2019 Dress Code PowerPoint (BHISD 7468–7479). -BHISD 7316 is a page from the 2017–2018 BHISD Student Code of Conduct draft presented to the board for approval in the 8/28/2017 Board Packet on Dress Code Revisions (BHISD 7293–7340).	reflect what is stated in the response.
13	(see 302 ROGs, Interrogatory No. 1, BHISD001739)	BHISD 1739 is a slide depicting a new addition to BHISD Elementary School South. This slide is from BHISD's Projects Update PowerPoint, 6/28/2021, detailing facility renovations from their 2020 bond.	
14	(See Ex. J, BHISD007590–007598; Ex. I, BHISD007590–BHISD007598)	BHISD 7590–7598 includes most of the PADC Committee Meeting Notes (BHISD 7590–7604).	
15	(Ex. H, BHISD007593–007599)	BHISD 7593–7599 includes most of the PADC Committee Meeting Notes (BHISD 7590–7604).	
15	(Ex. I, BHISD007526; BHISD007590–007599)	-BHISD 7526 is a slide prompting a “Table Talk” exercise from the 2022–2023 Dress Code PowerPoint (BHISD 7525–7539). -BHISD 7590–7599 includes most of the PADC Committee Meeting Notes (BHISD 7590–7604).	
16	Memorandum and Order (Ex. K, at 6–11)	This citation is correct insofar as it references the Memorandum Opinion filed on 4/03/2025 (Dkt. 167).	
16	(Ex. A–E, BHISD007235–007645)	BHISD 7235–7645 references 51 different documents ranging from the second page of the 2020 Dress Code Exemption Form (BHISD 7234–7325) to the Bruton Raw Data (BHISD 7606–8310).	George asserts that these documents reflect BHISD personnel admitting there is no basis for the grooming policy. These Bates-labeled documents do not reflect that assertion. George also states that no empirical data was used while citing the Bruton Raw

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			Data (BHSID 7606–7654).
16	(Ex. F–J, BHISD000302–012466)	BHISD 302–12466 reflects 203 different documents ranging from Archived Board Meeting Minutes, 1981–1989, (BHISD 204–663) to 2019–2021 Communications with Parents regarding Hair Policy – Emails, Skyward Blasts, and Handouts (BHISD 12454–12466).	
17	(See Ex. K, Memorandum Opinion Denying MSJ, at 6–11, Dkt. 167)	This citation is correct insofar as it references the Memorandum Opinion filed on 4/03/2025 (Dkt. 167).	
17	Id. at 9–11.	This citation is correct insofar as it references the Memorandum Opinion filed on 4/03/2025 (Dkt. 167).	
18	(See Ex. A through J; BHISD Bates Nos. BHISD000001–BHISD017000+)	BHISD 1–17000 reflects more than our entire document production. Medical Records from Dr. Natassia Johnson (BHISD 13400-13461) is the last Bates-labeled document we produced. BHISD 13462-17000 simply does not exist.	BHISD 13462–17000 does not exist.